

Jun. 28. 2012 1:46PM

No. 2004. P. 2/2

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BARKAT S. HOODA, M.D.,

Plaintiff,

V.

W.C.A. SERVICES CORPORATION
d/b/a WCA HOSPITAL, ET AL.,

Defendants.

WDNY DOCKET NO. 1:11-cv-00504

AFFIDAVIT OF BETSY T. WRIGHT

STATE OF NEW YORK)
) ss:
COUNTY OF CHAUTAUQUA)

BETSY T. WRIGHT, being duly sworn, deposes and says:

1. I am the President and CEO of the Woman's Christian Association Hospital of Jamestown, New York, d/b/a WCA Hospital.
2. I make this affidavit in support of Defendants' motion for summary judgment.
3. On June 11, 2010, Carol Gallagher, the Credentialing Specialist at WCA Hospital, came to my office shortly after 1 p.m. Ms. Gallagher informed that that she received an email from Dr. Hooda stating he would be leaving Jamestown the weekend of June 13, 2010. Ms. Gallagher also informed me that the Medical Director, Marlene Garone, M.D., had also been trying to reach Dr. Hooda and that she had not heard back from him.
4. I was aware that Dr. Hooda was under quality review and attempts were made to reach him. However, the Hospital had not heard back from him after leaving him several messages.

Jun. 28. 2012 1:45PM

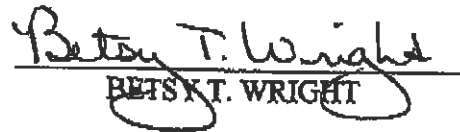
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5. On June 11, 2010, I was able to speak with Dr. Hooda while he was at Dr. Khan's office. I informed Dr. Hooda that he needed to meet with Dr. Garone because he was under quality review and that Dr. Garone had been trying to set up a meeting with him. Dr. Hooda said that he had sent an email regarding the case he thought I was referring to in our discussion. I told Dr. Hooda that sending an email did not mean that the review was closed and that he needed to meet with Dr. Garone.

6. Dr. Hooda agreed to meet with Dr. Garone, in her office, at 1:30 p.m. on Monday, June 14, 2010. I left Dr. Garone a note regarding the meeting.

7. I was informed that Dr. Hooda did not arrive for his meeting with Dr. Garone on June 14, 2010.

8. Thereafter, I sent a letter by certified mail to Dr. Hooda on or about July 22, 2010 confirming our conversations of June 11, 2010 and informing him that his failure to appear at the appointment with Dr. Garone would be reported to the New York Office of Professional Medical Conduct. The certified letter was returned to us by the post office as "Refused."


BETSY T. WRIGHT

Sworn to on 28th day of

June, 2012


NOTARY PUBLIC

BARBARA A. JANKO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01804748131
Qualified in Rensselaer County
My Commission Expires December 31, 2013